

	<p align="center">ESTABLISHING DOE SNF SITE INTERFACES THROUGH MOAs</p>	<p>Doc. No.: PMP 1.02 Revision: 1 Eff. Date: 02/25/2003 Page: 1 of 8 DAR No.: NSNF-445</p>
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Approval:	<u>Original Signed by Mark Arenaz</u>	Date:	<u>02/20/03</u>
	Manager, National Spent Nuclear Fuel Program		
Approval:	<u>Original Signed by Robert Blyth</u>	Date:	<u>02/20/03</u>
	NSNFP Quality Assurance Program Manager		

I. PURPOSE AND SCOPE

This procedure describes the use of memorandums of agreement (MOAs) as the mechanism for establishing interfaces between the National Spent Nuclear Fuel Program (NSNFP) and the *U.S. Department of Energy (DOE) spent nuclear fuel (SNF) sites* (see glossary). This procedure describes the format, content, and process to be used for initiating, revising, and canceling DOE SNF Site MOAs.

II. SUMMARY

This procedure describes the conditions that lead to the creation, revision, or cancellation of DOE SNF Site MOAs; prescribes the MOA format; addresses criteria to guide the development of content in common with criteria to be used by formal reviewers; and establishes review and approval authority.

The provisions of approved DOE SNF Site MOAs establish interfaces between NSNFP and DOE SNF sites.

III. PROCEDURE

A. Initiating, Revising, or Canceling DOE SNF Site MOAs

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| NSNFP
QAPM | <ol style="list-style-type: none"> 1. Establish and maintain interfaces with DOE SNF sites by: <ol style="list-style-type: none"> a. Directing the preparation of DOE SNF Site MOAs to coordinate the implementation of the quality assurance (QA) program requirements of DOE/RW-0333P, Quality Assurance Requirements and Description (QARD), and the requirements of the <i>technical baseline documents</i> (see glossary) with the participating DOE SNF sites. b. Directing the preparation of revisions to DOE SNF Site MOAs when: <ol style="list-style-type: none"> (1) Necessary to implement changes to the QARD (2) Necessary to implement changes to the Comprehensive MOA (see Reference section) (3) Organizational interfaces change within the DOE SNF sites, NSNFP, or DOE Environmental Management (EM) (4) Necessary to satisfy periodic reviews stipulated within DOE SNF Site MOAs. |
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B. Developing and Formatting DOE SNF Site MOAs and Revisions

- NSNFP QAS Manager
1. Upon direction from the NSNFP QAPM, begin the preparation of a DOE SNF Site MOA or a revision.
 2. Interface with the NSNFP Document Control Center (DCC) to select document numbers for MOAs.
 3. During development, annotate new DOE SNF Site MOAs or DOE SNF Site MOAs undergoing change with the word "Draft" after the revision number.
 4. At the discretion of the preparer, mark variations of the draft during development with Draft A, Draft B, etc.
 5. Place change bars in the right-hand column of the DOE SNF MOAs to signify text areas modified from one revision to the next.
 6. Use Attachment A, Development and Review Criteria for DOE SNF Site Memorandums of Agreement, as a guide in forming the content of DOE SNF Site MOAs or revisions.

C. Review and Approval of the DOE SNF MOAs and Revision

- NSNFP QAS Manager
1. Submit the completed draft DOE SNF Site MOAs or revisions for review and approval in accordance with NSNFP PMP 6.01.
 2. For the review and approval of DOE SNF Site MOAs, apply the NSNFP training requirements to the NSNFP personnel only.
 - a. Do not require NSNFP Training for non-NSNFP personnel serving as reviewers, i.e., reviewers representing DOE-Headquarters elements and DOE SNF sites.
 - b. Do not require non-NSNFP reviewers to record MOA comments on NSNFP forms.
 - c. Allow non-NSNFP reviewers to provide input in any format including markups, written communication, or electronic communication.
 - d. Show that non-NSNFP reviewers concurred with the final edited version of the MOA by their final approval signatures.
- NSNFP QAPM
3. Authorize the distribution of the approved DOE SNF Site MOAs in accordance with NSNFP PMP 6.01.

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D. Cancellation of DOE SNF Site MOAs

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| NSNFP
QAPM | 1. | Initiate the cancellation of a DOE SNF Site MOA when: <ul style="list-style-type: none"> a. A DOE SNF site no longer performs SNF activities related to interim storage or repository related activities that requires NSNFP participation. b. The interface between the NSNFP and a DOE SNF site is no longer required because the mission and objectives of the NSNFP have been accomplished with respect to the specific DOE SNF site. c. The MOA signatories concur with the cancellation as evidenced by correspondence between the NSNFP QAPM and all other signatories of the DOE SNF Site MOA. |
| NSNFP QAS
Manager | 2. | Upon direction from the NSNFP QAPM, prepare NSNFP internal documentation to cancel a DOE SNF Site MOA in accordance with NSNFP PMP 6.01. |
| NSNFP
Management | 3. | Authorize the cancellation of approved DOE SNF Site MOAs in accordance with NSNFP PMP 6.01. |

E. Interface with DOE SNF Sites

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| NSNFP
QAPM | 1. | Establish routine communications with DOE SNF sites to coordinate QA program matters. |
| | 2. | Interface with DOE SNF sites to execute the provisions of approved DOE SNF Site MOAs. |

IV. REFERENCES

Memorandum of Agreement for Acceptance of Department of Energy Spent Fuel and High-Level Radioactive Waste, between the Assistant Secretary for Environmental Management U.S. Department of Energy, Washington, D.C. and the Director Office of Civilian Radioactive Waste Management U.S. DOE, Washington, D.C., Revision 1, January 1999 (identified in NSNFP documents as the Comprehensive MOA).

V. DEFINITIONS

Terms appearing in italics followed by the notation “see glossary” are defined in the NSNFP Documents Manual Introduction and Glossary.

VI. ATTACHMENTS

Attachment A, Development and Review Criteria for DOE SNF Site Memorandums of Agreement

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VII. RECORDS

The following records generated as a result of this procedure require retention in accordance with the identified classification and Program Management Procedure 17.01.

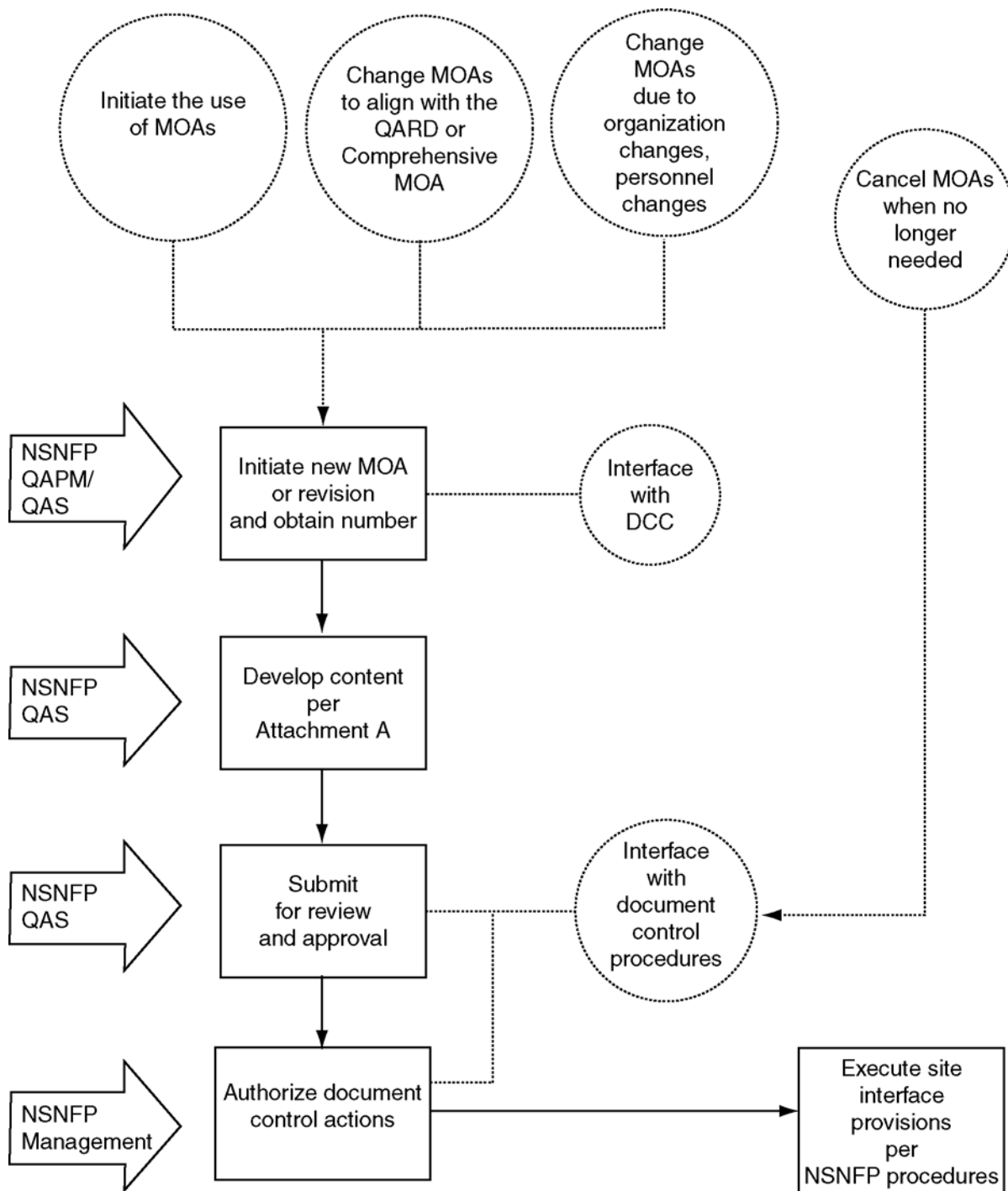
Lifetime

Approved DOE SNF Site MOAs and revisions.

Nonpermanent

Correspondence between the NSNFP QAPM and all other signatories of a DOE SNF Site MOA demonstrating concurrence with a proposal to cancel an MOA.

VIII. PROCEDURE FLOW DIAGRAM



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Attachment A

Development and Review Criteria for DOE SNF Site Memorandums of Agreement

Is the content and format of the plan compatible with the outline below?

1. PURPOSE: State the purpose of the memorandum of agreement (MOA). Identify the organizations that are parties to the MOA, other entities directly affected by the MOA, and scope of activities addressed by the MOA.
2. AGREEMENT: Describe the actions and conditions to which the parties are agreeing. Describe the commitments made by the party under the MOA.
3. COORDINATION OF QUALITY ASSURANCE ACTIVITIES: Describe the actions and conditions by which the Management and Organization (M&O) or Management and Integration (M&I) contractor executes its contractual QA functional responsibilities to establish a Quality Assurance (QA) program that meets DOE/RW 0333P, *Quality Assurance Requirements and Description* (QARD) for items and activities that affect the acceptance of U.S. Department of Energy (DOE)-owned spent nuclear fuel (SNF) in an Office of Civilian Radioactive Waste Management (OCRWM)-managed Nuclear Regulatory Commission (NRC)-licensed facility.
4. FLOW-DOWN OF TECHNICAL REQUIREMENTS: Describe the actions and conditions by which the parties identify or develop technical baseline documents for DOE SNF and related items necessary for repository licensing and operations, and state if certain technical baseline documents and other technical requirements require the creation of site specific deliverables.
5. ASSESSMENTS BY NSNFP QAPM: Describe the actions and conditions (i.e., access to facilities, personnel, and records) to support National Spent Nuclear Fuel Program (NSNFP) Quality Assurance Program Manager (QAPM) assessment activities.
6. OBSERVERS: Describe observer representatives who may participate as an observer (i.e., representative from affected units of state/local government) and if security access and safety rules apply.
7. REFERENCES: Identify the references by title, revision, and effective date, as appropriate.
8. AUTHORIZING SIGNATURES: Annotate space for representatives of the parties to sign the MOA.
9. ATTACHMENTS: Provide any additional documents needed to supplement implementation of the MOA.

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Attachment A

Are the following provisions included in the MOA as applicable?

1. A provision that the M&O/M&I contractor develops and maintains a documented QA program that complies with the requirements of the QARD for SNF activities they are required to perform.
2. A provision that the M&O/M&I contractor develops and maintains the applicable baseline provision documents identified in Appendix C of the Comprehensive MOA (can be viewed on the NSNFP home page by selecting Program Drivers).
3. A provision that the M&O/M&I contractor develops a QARD requirements matrix that identifies the following:
 - a. Where QARD requirements are addressed in their implementing procedures
 - b. Where QARD requirements are not applicable based on the scope of work
 - c. Where exceptions to the QARD have been taken, including justification.
4. A requirement that the M&O/M&I contractor review and evaluate the latest QARD revisions and determine if the changes will influence the M&O/M&I SNF QA Program's ability to meet the regulatory and programmatic commitments necessary for items and activities that could affect the acceptance of DOE-owned SNF in an OCRWM-managed NRC-licensed facility. If so, the respective DOE field office is required to help the M&O/M&I implement the changes and provide the NSNFP with either a schedule for implementing the changes or a justification for taking exception to the changes.
5. A provision that the M&O/M&I contractor provides access to facilities, personnel, and records to support assessment activities of the NSNFP QAPM; and that OCRWM, NRC, as well as, representatives from affected units of state and local government, will be permitted, consistent with security access and safety rules, to observe the QAPM assessments of the M&O contractor's SNF QA program and implementation of technical requirements.
6. A provision that the M&O/M&I contractor initially submits the following for review and acceptance:
 - a. QARD Requirements Matrix
 - b. Copies of the M&O/M&I contractor implementing procedures and revisions referenced in the matrix
 - c. Q-lists
 - d. A policy statement signed by M&O/M&I contractor senior line management directing mandatory compliance with the QARD-based QA program.

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Attachment A

7. A provision that the M&O/M&I contractor ensures respective QARD requirements matrices and Q-lists are revised as necessary and submitted to NSNFP QAPM for review annually if revised.
8. A provision that the M&O/M&I contractor submits the following on a quarterly basis:
 - a. Assessment schedules identifying M&O/M&I contractor's SNF-related activities.
 - b. SNF-related quarterly QA program information reports containing the following information as a minimum: accomplishments (QA), result of assessment activities, problems and adverse conditions, and lessons learned.